

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

MIKUL KLEHM,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	C.A. NO. 4:22-CV-01226
	§	JUDGE ESKRIDGE
RAWLTYN J. HART in his individual	§	JURY DEMANDED
capacity; and HARRIS COUNTY,	§	
TEXAS aka HARRIS COUNTY	§	
SHERIFF'S OFFICE,	§	
<i>Defendants.</i>	§	

**CERTIFICATE OF CONFERENCE**

I certify that on January 17, 2025, at 9:45 AM, I emailed both counsel for the plaintiff, Mr. Campagne and Mr. Bleakney, to inquire whether they opposed to Defendant Hart's (Conditional) Motion for Bifurcated Trial on Individual Officer and County (*Monell*) Liability. Neither has responded. I called their office at 3:15 p.m., and was told they are in trial. At this time, I am unaware whether they are opposed. I will amend this certificate as soon as they notify me of their position.

The County's counsel, Rachel Fraser, does not oppose the motion.

\* \* \* \*

Respectfully submitted,

VIADA & STRAYER

By: /s/ **RAMON G. VIADA III**

Ramón G. Viada III

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ATTORNEY FOR DEFENDANT

RAWLTYN HART

**CERTIFICATE OF SERVICE**

I certify that all counsel of record have been served a true and correct copy of this document by electronic submission for filing and service through the Electronic Case Files System of the Southern District of Texas on January 17, 2025.

/s/ **RAMON G. VIADA III**

Ramón G. Viada III